

EXHIBIT “B”



Tracie Geiger <tracie@haneygroup.net>

RE: Discovery

1 message

Mark, Eli (USANYS) <Eli.Mark@usdoj.gov>

Wed, Dec 16, 2020 at 11:49 AM

To: Steve <steve@haneygroup.net>

Cc: Tracie Geiger <tracie@haneygroup.net>, "Solowiejczyk, Noah (USANYS)" <Noah.Solowiejczyk@usdoj.gov>, "Boone, Robert (USANYS) 1" <Robert.Boone@usdoj.gov>

Steve,

We agree with your assessment that discovery we produced under Judge Kaplan's and Judge Ramos's protective orders cannot be shared. If the other lawyers want to discuss further with us, we can.

Regards,

Eli

Eli J. Mark

Assistant U.S. Attorney

Southern District of New York

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New York, New York 10007

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-----Original Message-----

From: Steve <steve@haneygroup.net>

Sent: Wednesday, December 16, 2020 11:01 AM

To: Mark, Eli (USANYS) <EMark@usa.doj.gov>; Solowiejczyk, Noah (USANYS) <NSolowiejczyk@usa.doj.gov>

Cc: Tracie Geiger <tracie@haneygroup.net>

Subject: Discovery

Gentlemen,

A Motion to Compel has been filed in the Bowen civil suit against me and Christian to produce discovery that clearly is subject of the protective order. Though it would help Dawkins' defense, I am not producing and want confirmation you too would view such production as a violation of the Protective order.

I need to file a response to the Motion by Friday. I told Bowen's attorney he needs to likely get an Order that can compete with Kaplan's Order. I don't want to get dragged into that argument.

Thanks,

Steven A. Haney

Attorney at Law